EXHIBIT 1

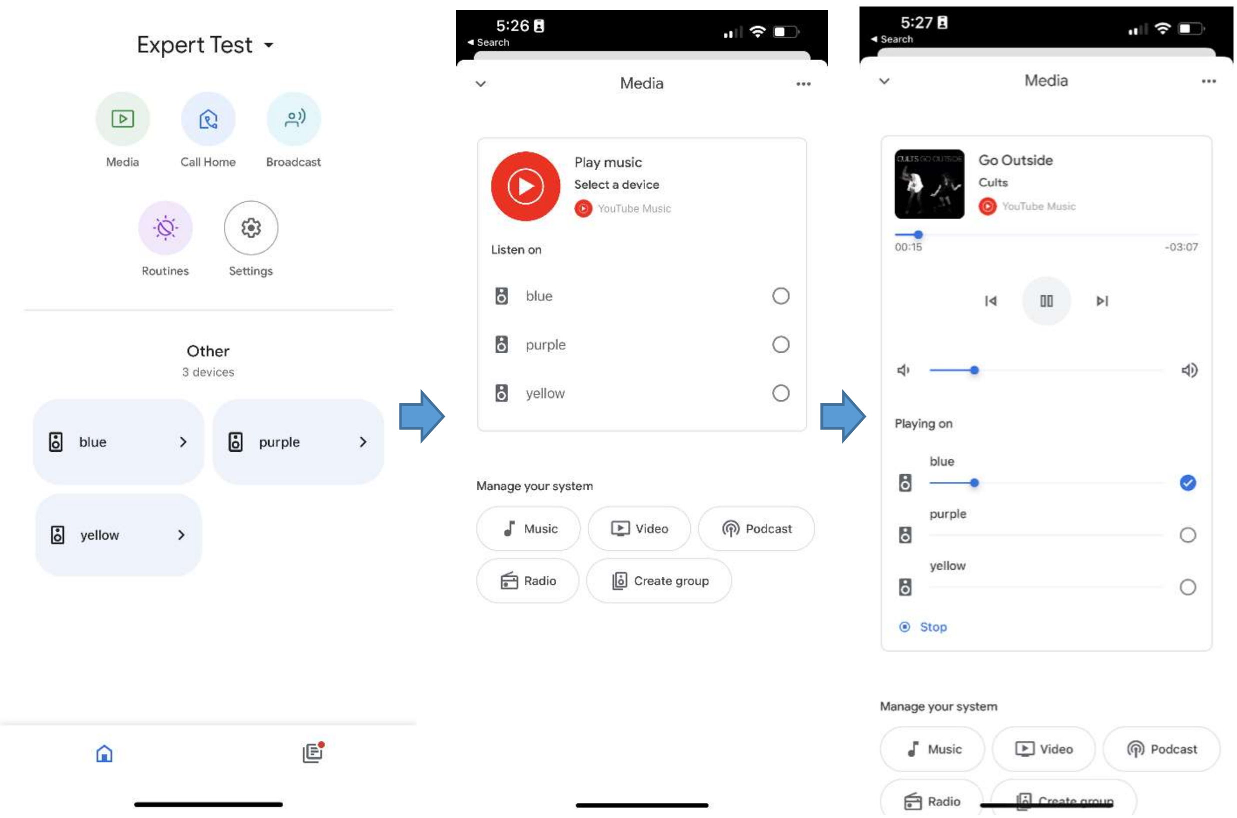
Filed Under Seal

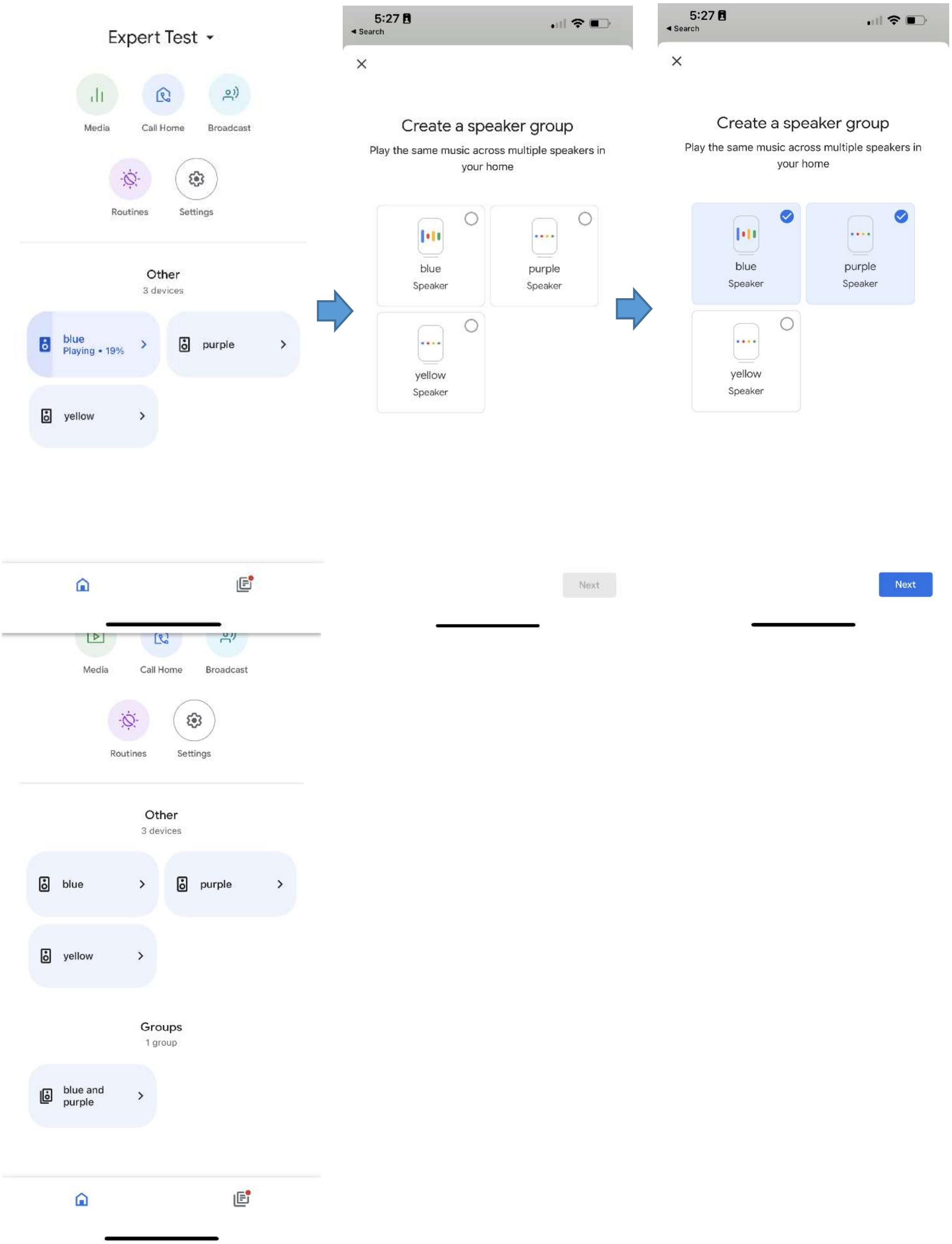
REPLY EXPERT REPORT OF DR. DAN SCHONFELD REGARDING
U.S. PATENT NO. 10,848,885 AND U.S. PATENT NO. 10,469,966

he previously made in his July 27, 2022 rebuttal report to argue the "conception" of the '885 claimed invention. Dr. Almeroth does not appear to be drawing any distinction or to be relying on different portions of the documents as evidence of the alleged invention of both the '885 and the '966 patents, including with respect to his infringement report regarding the '966 patent. This is true for each of Dr. Almeroth's validity arguments for the '966 patent.

18. Dr. Almeroth also purportedly provides previously undisclosed contentions on Sonos's conception. *E.g.*, Almeroth Reb. Rep. ¶¶ 281-283. In particular, Dr. Almeroth argues that SONOS-SVG2-00026888 evidences conception of the "'zone scene' concept" prior to the Sonos Forums. *Id.* But this document instead shows that Mr. Lambourne did not invent the "zone scenes" concept at all, and instead that he was given that idea. As Mr. Schulert wrote to Mr. Lambourne, he would appreciate the "simple and effective" solution of "permanently linking zones together" and having the zone groups return to their previous assignments after "unlinking" from party mode. Just like the members of Sonos Forums, he was unsatisfied with the process of having to "unlink" and then "relink" zones frequently.

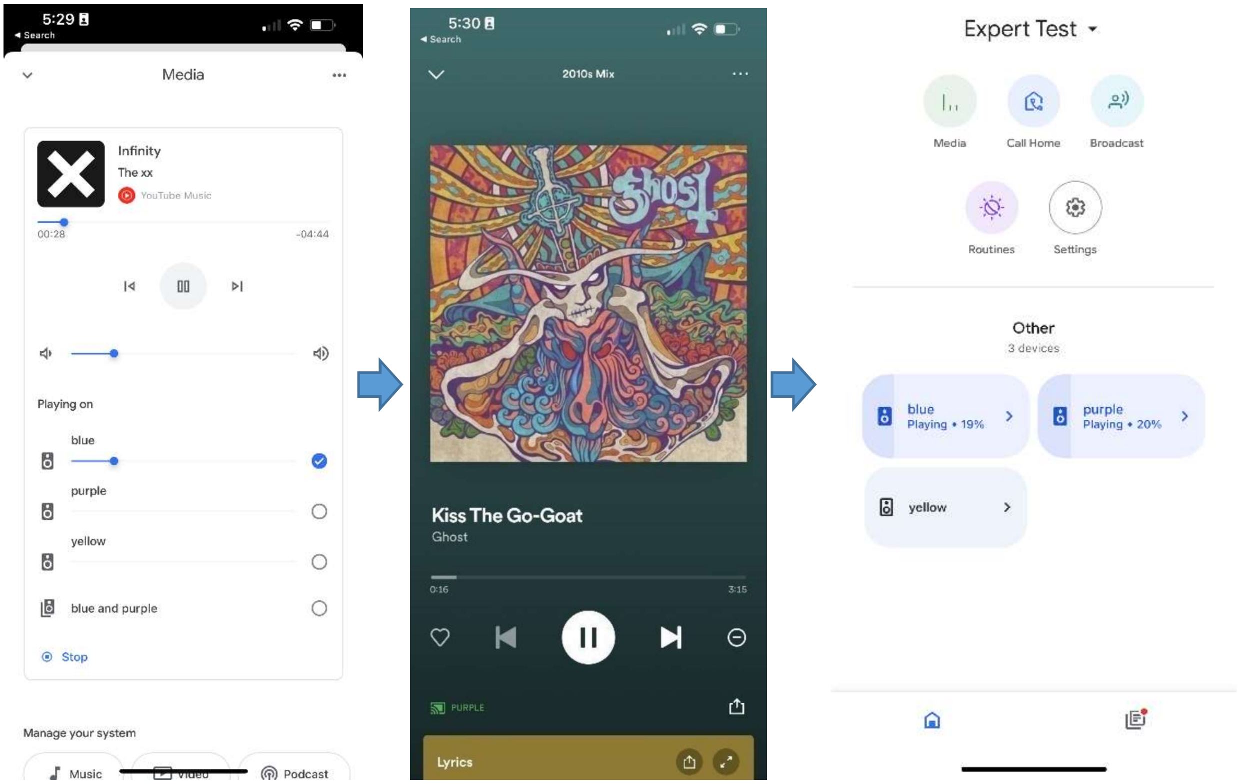
88. For example, the screenshots below show a user creating a speaker group where one of the two speakers used to create the speaker group is currently playing back music and one of the two speakers used to create the speaker group is not playing back music. In this circumstance, the two speakers Dr. Almeroth accuses of "standalone" mode go into grouped playback where the group is not playing back music. As such, the speaker that was formerly playing back music stops and matches the (non-)playback of the group, and the speaker that was not playing back music also matches the (non-)playback of the group.



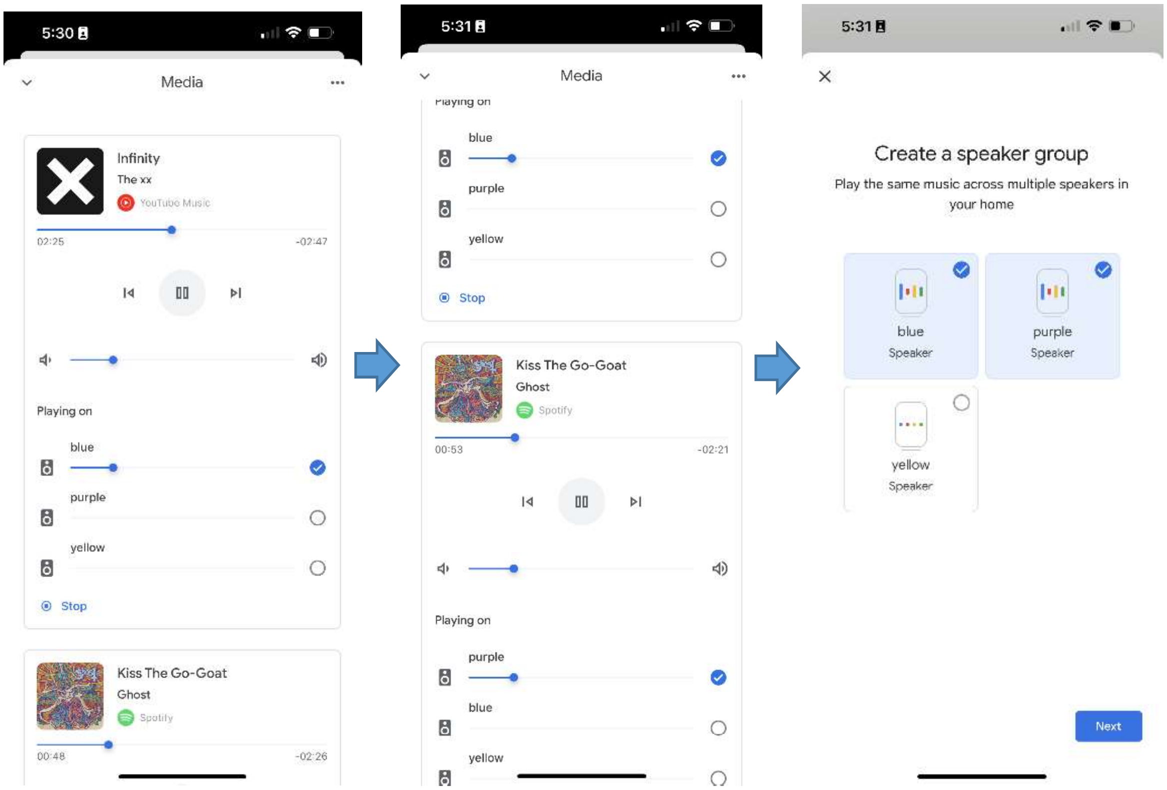


89. Likewise, when a user creates a speaker group and the two speakers used to create the group are each playing different songs, both speakers are immediately transitioned from

playing back music individually to matching the (non-)playback of the group. The speakers do not continue playing back music individually as they had before they were added to the group and instead operate as members of the group.



Contains Highly Confidential AEO and Source Code Materials



5:30

Media

Infinity
The xx
YouTube Music

02:25 -02:47

Playing on

blue ✓

purple ○

yellow ○

Stop

Kiss The Go-Goat
Ghost
Spotify

00:48 -02:26

5:31

Media

Playing on

blue ✓

purple ○

yellow ○

Stop

Kiss The Go-Goat
Ghost
Spotify

00:53 -02:21

Playing on

purple ✓

blue ○

yellow ○

5:31

×

Create a speaker group

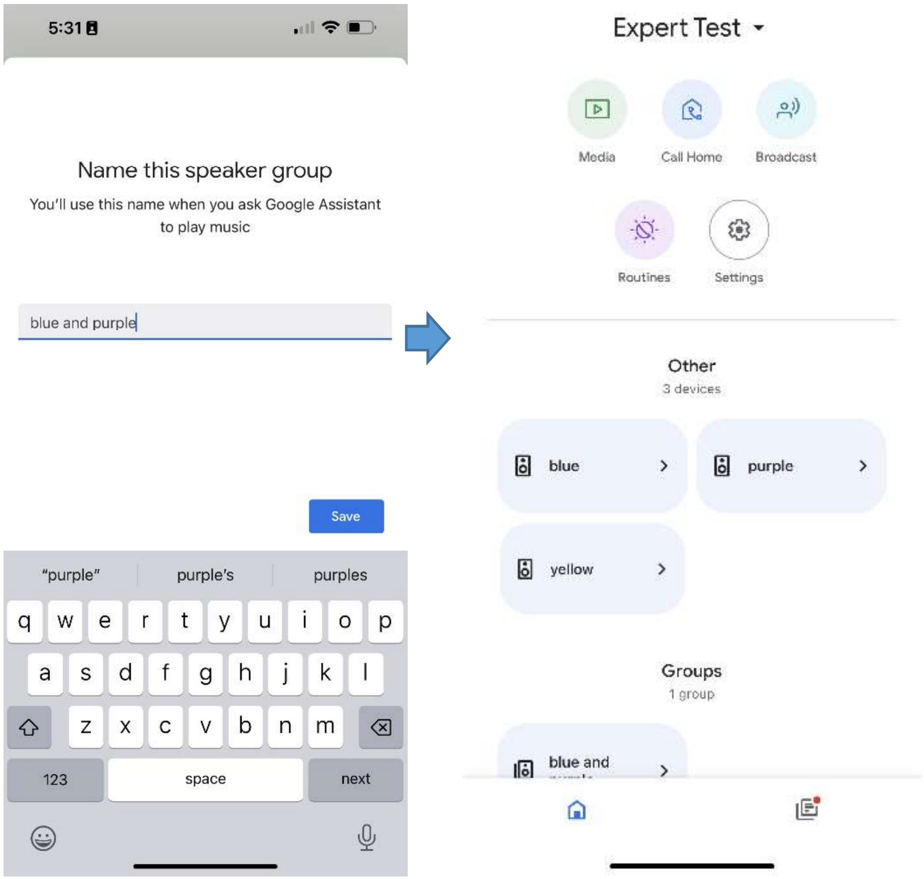
Play the same music across multiple speakers in your home

blue Speaker ✓

purple Speaker ✓

yellow Speaker ○

Next



Name this speaker group

You'll use this name when you ask Google Assistant to play music

blue and purple

Expert Test

Other
3 devices

blue

purple

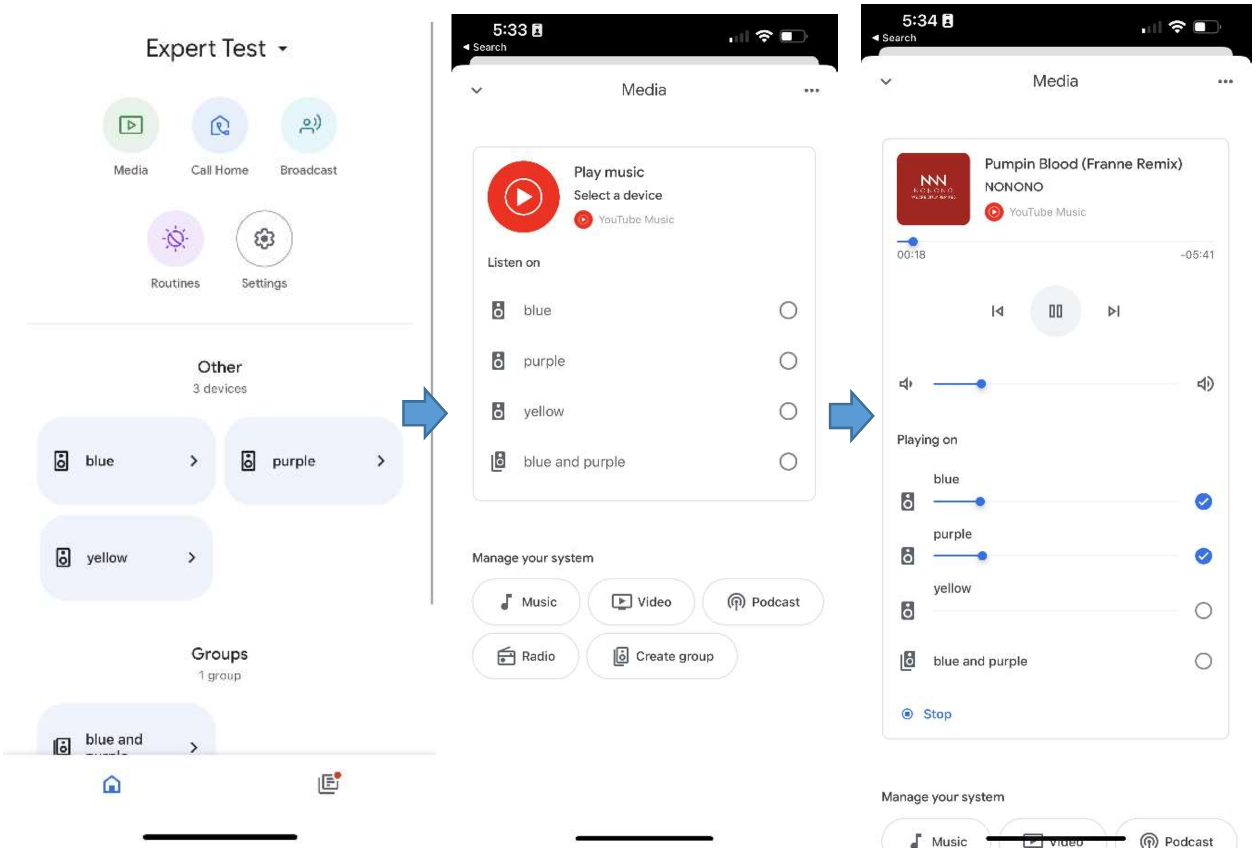
yellow

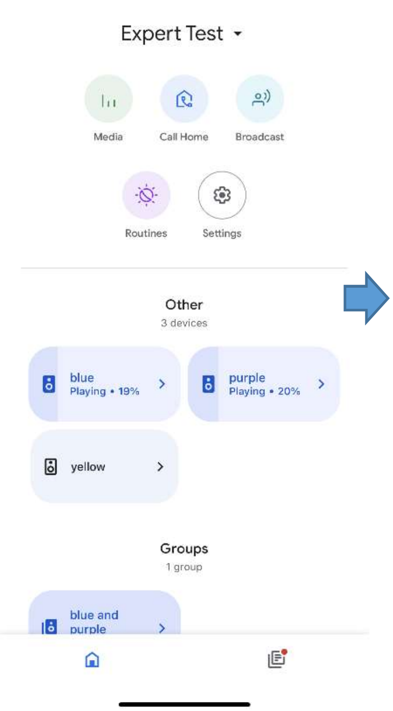
Groups
1 group

blue and purple

90. Dr. Almeroth therefore mischaracterized and misunderstood the functionality of the accused devices as they operate under Google's deployed design change. Dr. Almeroth previously opined that Google's speakers remained in the accused "standalone mode" because a speaker added to a group would continue to play back music if it had been doing so before. That is not the case, and instead in *every* situation, a speaker added to a group will assume the playback status of the group.

91. For example, in a situation that Dr. Almeroth does not address, a user may add a silent speaker to a group currently playing music. In this situation, the silent speaker will exit the accused "standalone mode" and assume the playback status of the group, which in this case is actively playing back music.


Expert Test
Media
Call Home
Broadcast
Routines
Settings
Other
3 devices
blue
purple
yellow
Groups
1 group
blue and purple
5:33
Search
Media
Play music
Select a device
YouTube Music
Listen on
blue
purple
yellow
blue and purple
Manage your system
Music
Video
Podcast
Radio
Create group
5:34
Search
Media
Pumpin Blood (Franne Remix)
NONONO
YouTube Music
00:18
-05:41
Playing on
blue
purple
yellow
blue and purple
Stop
Manage your system
Music
Video
Podcast



Expert Test

Other
3 devices

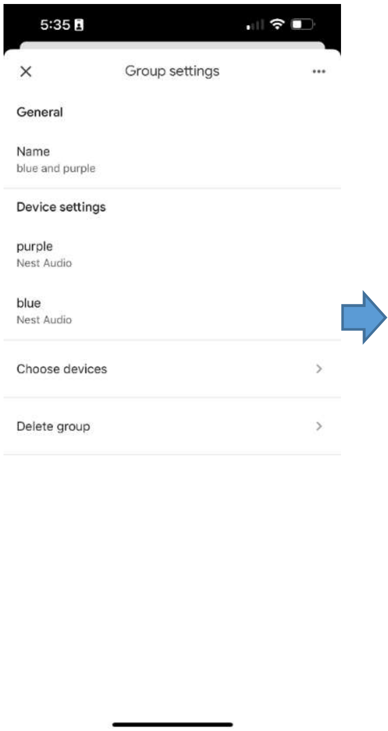
blue
Playing • 19%

purple
Playing • 20%

yellow

Groups
1 group

blue and purple



5:35

Group settings

General

Name
blue and purple

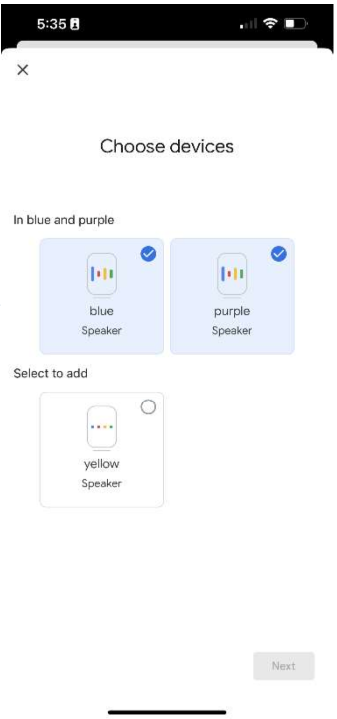
Device settings

purple
Nest Audio

blue
Nest Audio

Choose devices

Delete group



5:35

Choose devices

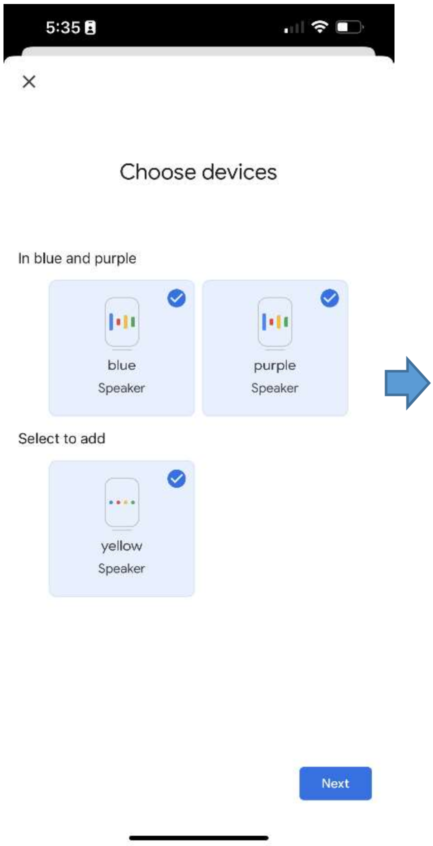
In blue and purple

blue
Speaker

purple
Speaker

Select to add

yellow
Speaker



5:35

Choose devices

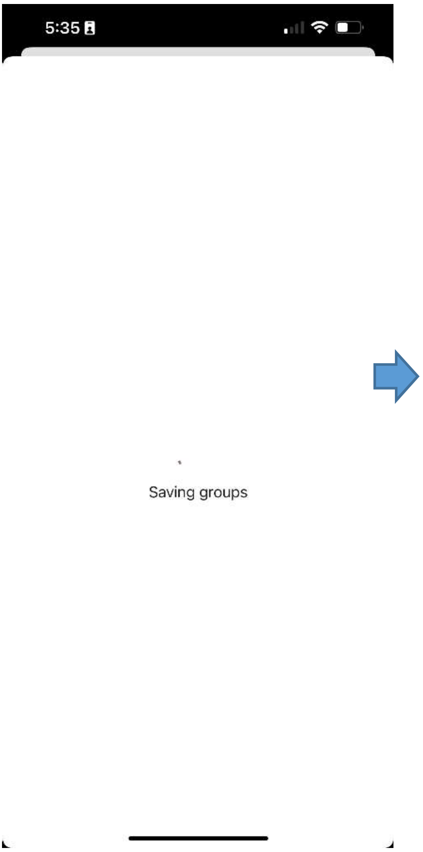
In blue and purple

blue
Speaker

purple
Speaker

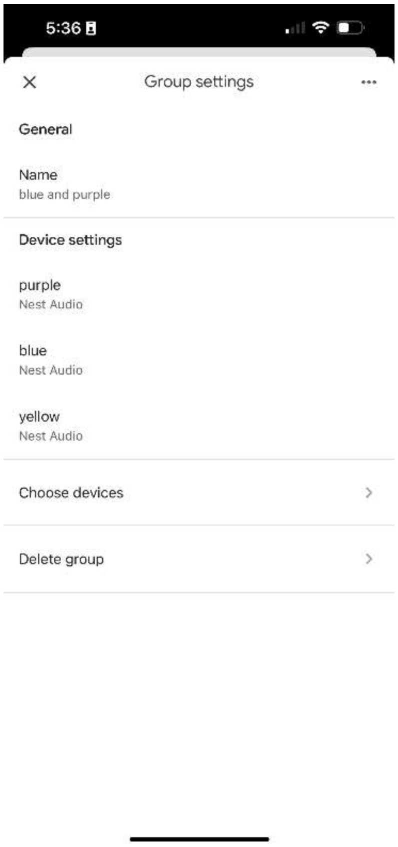
Select to add

yellow
Speaker



5:35

Saving groups



5:36

Group settings

General

Name
blue and purple

Device settings

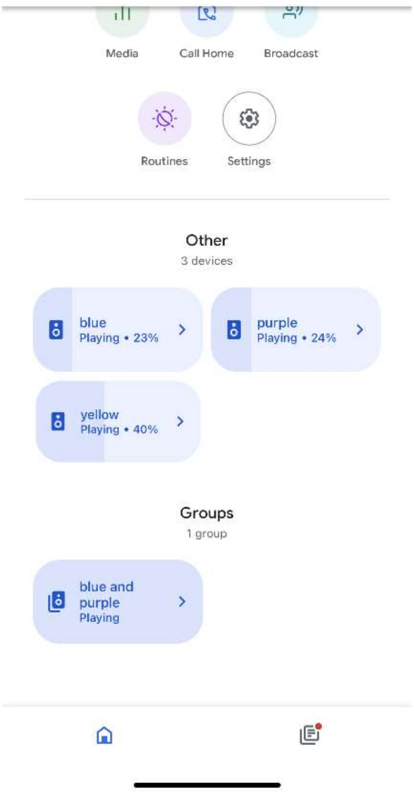
purple
Nest Audio

blue
Nest Audio

yellow
Nest Audio

Choose devices

Delete group



Other
3 devices

blue
Playing • 23%

purple
Playing • 24%

yellow
Playing • 40%

Groups
1 group

blue and purple
Playing

92. As another example, Dr. Almeroth also does not address the situation where a speaker playing music is added to a group that is playing different music. In this situation, the speaker that is individually playing music will exit the accused "standalone mode" and assume the playback status of the group, which in this case is actively playing back the music of the group.

individually, or as part of a group. Dr. Almeroth relies on silence or sound for his opinions, but as I showed with examples above, this is an insufficient analysis.

100. When a speaker is added to a group, one of the steps taken is to add the speaker to the group such that it conforms to the behavior of the group. This is illustrated in the code section below. As I highlighted, the source code shows function calls to StopCurrentApp() and AddGroup, which begin the process of forcing the newly added speaker to conform to the group's behavior. The speaker *does not* continue to operate in an "individual playback mode" as Dr. Almeroth opines. To the contrary, the speaker has been added to and operates in conjunction with the group. This is the reason that, as I illustrated in examples above, the newly added speaker matches the music playback (or non-playback) of the group in every situation in which the speaker is added to a group.

```
base::flat_set<std::string> group_uuids({virtual_group_uuid_});
  for (const auto& g : local_groups) {
    group_uuids.insert(g.uuid);
    auto it = groups_.find(g.uuid);
    if (it == groups_.end()) {
      StopCurrentApp();
      AddGroup(g);
    } else if (it->second->Reconfigure(g)) {
      SaveGroupConfig(g);
    } else {
      continue;
    }
    groups_changed = true;
```

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101. For the foregoing reasons, Dr. Almeroth's opinion (which is unsupported by evidence), that a speaker added to a group continues "operating in a mode for individual playback" is incorrect.

> Thus, even if an Accused Google Player engaging in active individual playback when receiving a join_group message for a new speaker group is configured to stop its active playback in response to receiving a "join_group" message (per Google's alleged "alternative"), the Accused Google Player would still meet the claimed